



GENERAL PNEUMATICS
CORPORATION

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Western Research Center
7662 E. Gray Road Suite 107
Scottsdale, Arizona 85260
(602) 996-1656 FAX: (602) 951-1934

August 10, 1993

Federal Highway Administration
Office of the Chief Counsel
FHWA Docket No. MC92-4
Room 4232, HCC-10
400 Seventh Street, S.W.
Washington, DC 20590

FHWA-97-2180-10

Dear Sirs:

I am writing to express my strong objection to the way the U.S. Department of Transportation (DOT) is interpreting provisions of the Hazardous Materials Transportation and Uniform Safety Act of 1990, and specifically how it is proposing to classify exclusively liquefied natural gas (LNG) as a hazardous material. I do not believe Congress intended to single out LNG in the legislation to the exclusion of other natural gas liquids such as propane, ethane or butane.

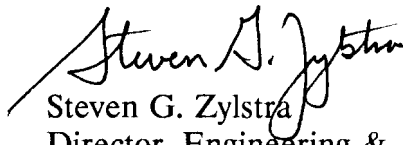
Section 8 of the Act requires, "the establishment of a motor carrier safety permit program, at a minimum, for motor carriers transporting class A and/or B explosives, liquefied natural gas, hazardous materials designated as extremely toxic by inhalation, or highway route controlled quantity radioactive materials." The DOT's Notice of Proposed Rule Making (June 17, 1993, pp. 33418-33425) in response to the requirements of the Act, groups LNG with three other substances: (1) explosives, (2) materials designated extremely toxic by inhalation, and (3) radioactive materials. While General Pneumatics strongly supports efforts to broaden the authority of the DOT to regulate transporters of hazardous substances, we strongly object to DOT's literal definition of "liquefied natural gas" to mean specifically LNG and no other natural gas liquids. We believe that Congress intended "liquefied natural gas" to mean all liquid fuels that are derived from natural gas. Had Congress intended to single out LNG, it would have referred to it specifically as liquid methane as it is referred in the Federal Tax Code (CFR 48.1041-8d).

FHWA Docket No. MC92-4
August 10, 1993
Page 2

DOT's misguided approach threatens to jeopardize the efforts of General Pneumatics to commercialize our natural gas liquefier, a technology that will provide fueling infrastructure for LNG vehicles. Should DOT include only LNG with these other hazardous substances in its final rule, LNG's image as a transportation fuel will be severely damaged. This would be most unfortunate both to our company's commercialization efforts, and will adversely impact the efforts to utilize more broadly a domestic fuel which today is being used safely in school buses and transit fleets, and to advance the wider use of clean-fueled vehicles.

If we can answer any questions regarding our concerns, please contact me at your convenience. Thank you for your consideration of our input.

Sincerely,
GENERAL PNEUMATICS CORPORATION



Steven G. Zylstra
Director, Engineering &
General Manager, Western Research Center

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